

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

INA STEINER, *et al.*,

v.

JIM BAUGH, *et al.*

No. 21-cv-11181-DPW

**DEFENDANT JIM BAUGH'S MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant Jim Baugh moves to dismiss the Complaint [D.E. #1] for failure to state a claim upon which relief may be granted. A memorandum of law accompanies this motion.

Respectfully submitted,

**JIM BAUGH**

By his attorneys,

/s/ William W. Fick

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 5, 2021.

/s/ William W. Fick